

NICHOLAS J. SANTORO, ESQ.
Nevada Bar No. 0532
JASON D. SMITH, ESQ.
Nevada Bar No. 9691
SANTORO WHITMIRE
10100 W. Charleston Blvd., Suite 250
Las Vegas, Nevada 89135
Tel.: (702) 948-8771 / Fax: (702) 948-8773
Email: nsantoro@santoronevada.com
jsmith@santoronevada.com

JOSEPH DINOIA, ESQ.
Nevada Bar No. 11951
RACHEL B. SATURN, ESQ.
Nevada Bar No. 8653
PATENAUE & FELIX, A.P.C.
7271 W. Charleston Blvd., Suite 100
Las Vegas, Nevada 89117
Tel.: (702) 952-2031
Email: joseph.dinoia@pandf.us
rachel.saturn@pandf.us

*Attorneys for Counterclaimant/Third-Party
Plaintiff Patenaude & Felix APC*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TROY CAPITAL LLC, a Nevada Limited
Liability Company,

Plaintiff,

v.

PATENAUE & FELIX APC, a California
Professional Corporation; RAYMOND A.
PATENAUE, a California Attorney (CA Bar
#128855); MICHAEL D. KAHN, a California
Attorney (CA Bar #236898); ANGIE HONG
HOAR, a California Attorney (CA Bar #212152);
KRISTOPHER C. CHILDERS, an Arizona
Attorney (AZ Bar #022388), RYAN JOHNSON,
an Arizona Attorney, DOE ATTORNEYS 1-10;
DOE individuals 11-20; ROE LAW FIRMS 1-10;
and ROE entities 11-20,

Case No.: 2:20-cv-00205-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE
REGARDING MOTION TO DISMISS
[ECF No. 77]**

(First Request)

Defendants.	
PATENAUDE & FELIX APC, a California Professional Corporation,	
Counterclaimant,	
v.	
TROY CAPITAL LLC, a Nevada Limited Liability Company,	
Counter Defendants.	
PATENAUDE & FELIX APC, a California Professional Corporation,	
Third-Party Plaintiff,	
v.	
RANCE WILLEY, an individual; TROY DUPUIS, an individual; Does 1-XX and Roe Corporations I-XX, inclusive,	
Third-Party Defendants.	

Plaintiff/Counterdefendant TROY CAPITAL LLC (“*Troy Capital*”), Defendants PATENAUDE & FELIX, APC, RAYMOND A. PATENAUDE, MICHAEL D. KAHN, and ANGIE HONG HOAR (collectively, “*Defendants*”), Counterclaimant/Third-Party Plaintiff PATENAUDE & FELIX, APC (“*Counterclaimants*”), and Third-Party Defendants RANCE WILLEY and TROY DUPUIS (together, “*Third-Party Defendants*”), by and through their undersigned counsel, hereby stipulate as follows:

IT IS HEREBY STIPULATED AND AGREED that the time for Counterclaimants to respond to response to Troy Capital’s and Third-Party Defendants’ Motion to Dismiss Defendants’ [Second] Amended Counterclaims [ECF No. 72] and Third-Party Complaint [ECF No. No. 73] with Summary Judgment Treatment, or, in the Alternative, for Dismissal under FRCP 9 (“*Motion to Dismiss*”) [ECF No. 77] be extended to April 26, 2021.

IT IS FURTHER STIPULATED AND AGREED that the time for Troy Capital and Third-Party Defendants to file any reply in support of the Motion Dismiss be extended to May 13, 2021.

Good cause exists for the extensions set forth herein. The proposed briefing schedule addresses the conflicts with schedules of counsel and the potential complexities of this matter. Further, the parties and their counsel are dealing with difficulties arising from working remotely due to COVID-19 restrictions and precautions. This is the first extension requested.

Dated this 19th day of April, 2021.

/s/ Dale K. Kleven

DALE K. KLEVEN, ESQ.

Nevada Bar No. 7778

THOMAS M. FRONCZEK, ESQ.

Nevada Bar No. 11380

RELIEF LAWYERS LLC

5550 Painted Mirage Rd., Suite 320

Las Vegas, Nevada 89149

Tel.: (702) 589-7520 / Fax: (702) 577-1075

Email: dale@relieflawyersnv.com

Attorneys for Plaintiff/Counter Defendant Troy Capital LLC and Third-Party Defendants Rance Willey and Troy Dupuis

/s/ Jeffrey D. Olster

JEFFREY D. OLSTER, ESQ.

Nevada Bar No. 8864

ADAM J. PERNSTEINER, ESQ.

Nevada Bar No. 7862

LEWIS BRISBOIS BISGAARD & SMITH LLP

6385 S. Rainbow Blvd., Suite 600

Las Vegas, Nevada 89118

Tel.: (702) 893-3383 / Fax: (702) 893-3789

Email: jeff.olster@lewisbrisbois.com

adam.pemsteiner@lewisbrisbois.com

Attorneys for Defendants Patenaude & Felix APC, Raymond A. Patenaude, Michael D. Kahn and Angie Hong Hoar

/s/ Jason D. Smith

NICHOLAS J. SANTORO, ESQ.

Nevada Bar No. 0532

JASON D. SMITH, ESQ.

Nevada Bar No. 9691

SANTORO WHITMIRE

10100 W. Charleston Blvd., Suite 250

Las Vegas, Nevada 89135

Tel.: (702) 948-8771 / Fax: (702) 948-8773

Email: nsantoro@santoronevada.com

jsmith@santoronevada.com

JOSEPH DINOIA, ESQ.

Nevada Bar No. 11951

RACHEL B. SATURN, ESQ.

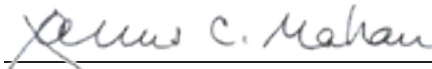
Nevada Bar No. 8653

PATENAUDE & FELIX, A.P.C.

7271 W. Charleston Blvd., Suite 100

1 Las Vegas, Nevada 89117
2 Tel.: (702) 952-2031
3 Email: joseph.dinoia@pandf.us
4 rachel.saturn@pandf.us
Attorneys for Counterclaimant/Third-Party
Plaintiff Patenaude & Felix APC

5 **IT IS SO ORDERED:**

6 
7 _____
8 UNITED STATES DISTRICT JUDGE

9 DATED: April 21, 2021
10 _____
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27